

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

Eugene Westmoreland,)	
)	
<i>Plaintiff,</i>)	
)	
-vs-)	No. 23-cv-1851
)	
Thomas Dart, Sheriff of Cook County,)	Judge Tharp Jr.
and Cook County, Illinois,)	
)	Magistrate Judge Gilbert
)	
<i>Defendants.</i>)	

JOINT STATUS REPORT

Pursuant to the Court's order entered April 19, 2024, Dkt. 74, the parties file the following updated status report:

I. Status of settlement letters

Plaintiff served a settlement letter on April 24, 2024. Defendants responded to this letter on May 9, 2024, seeking more information to formulate a response.

On May 21, 2024, plaintiff's counsel served defendants a supplemental settlement position. The defendants responded on May 22, 2024.

Plaintiff's additional comment

Defendants' settlement letters do not provide a proposal for the parties to resolve any part of this case. Plaintiff's counsel believes a settlement conference may assist the parties resolve some, if not all, of the pending issues, including the non-monetary request for defendants to remedy the non-compliant east tunnel ramp in the lower level

of the Cook County Jail's Residential Treatment Unit. This is the subject of a pending motion for permanent injunctive relief. *See* Dkt. 72.

Defendants' additional comment

Unfortunately, given the wide gap between the parties, the defendants do not believe engaging in settlement conference at this stage would be productive.

II. Status on rebuttal expert disclosures

Plaintiff served an expert rebuttal disclosure on May 1, 2024.

Defendants did not serve an expert rebuttal disclosure.

III. Status on expert depositions

Plaintiff's expert, Gary Keclik, will be deposed on May 23, 2024 at 1:30 p.m.

Defendants' expert, Carl Darr, will be deposed on June 3, 2024 at 1:30 p.m.

Respectfully submitted,

/s/ Patrick Morrissey
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